

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Caption:

HARRY JEFFRIES

Full name(s) of Plaintiff(s)

AMMENDED,
COMPLAINT
FOR EMPLOYMENT
DISCRIMINATION

v.

TEEN CHALLENGE-CHALLENGE

TRAINING CENTER

MRS. BETTY DOUBRAVSKY

Full name(s) of Defendant(s) HUMAN RESOURCES MANAGER

CIVIL ACTION
NO. 14-5255

This action is brought for discrimination in employment pursuant to (check only those that apply):

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634.

NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission, and you must have been at least 40 years old at the time you believe that you were discriminated against.

Americans with Disability Act of 1990, as codified, 42 U.S.C. §§ 12112-12117.

NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

Pennsylvania Human Relations Act, as codified, 43 Pa. Cons. Stat. §§ 951-963 (race, color, family status, religious creed, ancestry, handicap or disability, age, sex, national origin, the use of a guide or support animal because of blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals).

NOTE: In order to bring suit in federal district court under the Pennsylvania Human Relations Act, you must first file a complaint with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations, and then you must wait one year prior to filing a lawsuit.

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name: HARRY JEFFRIES
 Street Address: 160 S. 4TH STREET
 County, City: BERKS READING
 State & Zip: PA 19602
 Telephone Number: _____

- B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page. Attach additional sheets of paper as necessary.

Defendant Name: MRS. BETH DABRANSKY
 Street Address: 33 TEEN CHALLENGE ROAD
 County, City: BERKS COUNTY
 State & Zip: PA 19550
 Telephone Number: 717-933-4182

- C. The address at which I sought employment or was employed by the defendant(s) is:

Employer: TEEN CHALLENGE TRAINING CENTER
 Street Address: 33 TEEN CHALLENGE RD.
 County, City: BERKS 19550
 State & Zip: PA 19550
 Telephone Number: 717-933-4182

II. Statement of the Claim

- A. The discriminatory conduct of which I complain in this action includes (*check only those that apply to your case*):

- Failure to hire me
 Termination of my employment
 Failure to promote me

- Failure to reasonably accommodate my disability
 Failure to reasonably accommodate my religion
 Failure to stop harassment
 Unequal terms and conditions of my employment
 Retaliation
 Other (specify): Hired Thier personal attorney non-Teen Challenge Lawyers

NOTE: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

FOUR BLOCKS
FROM MY HOME

B. It is my best recollection that the alleged discriminatory acts occurred or began on or about: (month) 07-10-10, (day) 10, (year) 2010.

C. I believe that the defendant(s) (check one):

- is still committing these acts against me.
 is not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check only those that apply and state the basis for discrimination, for example, what is your religion, if religious discrimination is alleged):

race _____ color _____
 religion _____ gender/sex _____
 national origin _____

age My date of birth is 01-12-68 (Give your date of birth only if you are asserting a claim of age discrimination)

E. The facts of my case are as follow (attach additional sheets of paper as necessary):

I WAS EMPLOYED BY TEEN CHALLENGE TRAINING CENTER AFTER I GRADUATED FROM THE ONE YEAR PROGRAM TO A EXTENDED TRAINING. THE HUMAN RESOURCE MANAGER HAD CALLED ME TO HER OFFICE THEN SHE FOLLOWED BY TOUCHING ME IN APPROPRIATELY ON BUTTICKS MY BUTTICKS I COMPLAINED 3 THREE TIMES WE HAD THREE MEETINGS ABOUT THE PROBLEM . MY SELF AND THE PRESIDENT DR. -3- JOE BATLUCK AND JIM WEST ALSO DARLENE PUND T I HAD SOME HELP MY CO WORKERS TOOK ME TO MEET WITH THE HUMANS RELATIONS INVESTIGATE

Teen CHALLENGE TRAINING CENTER
WAS CHARGED AND BETH DORBRANSKY
AS SO SHE WAS CONSEQUENTLY SERVED
TWICE AND BOTH TIMES JOE BUTLUCK HAS
CONTINUED HIS DISHONEST EFFORT TO KEEP
THIS WHOLE THING HID FROM THE BOARD
OF DIRECTOR IN MISSOURI. TEEN CHALLENGE
I NEVER WANTED WAS FOR HER TO
STOP I ASKED DR. BUTLUCK AND HE
ASSURED ME THAT WOULD NOT HAPPEN
AGAIN WHEN THE HUMAN RELATIONS
SERVED HER MRS. BETH DORBRANSKY
AND TEEN CHALLENGE TRAINING
CENTER I WAS THREE WEEK AFTER
TERMINATED. ALSO I WAS NOT
THE FIRST MAN WHO COMPLAINED
ABOUT MRS. BETH DORBRANSKY
ANOTHER STUDENT BEFORE ME ALSO
COMPLAINED AGAINST MRS. DORBRANSKY
AND WAS LATER TERMINATED

NOTE: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the Pennsylvania Human Relations Commission, or the Philadelphia Commission on Human Relations.

III. Exhaustion of Administrative Remedies:

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on: 08-25-2010 (Date).
10-24-2010. Two times
- B. The Equal Employment Opportunity Commission (check one):

has not issued a Notice of Right to Sue Letter.
 issued a Notice of Right to Sue Letter, which I received on _____ (Date).

NOTE: Attach to this complaint a copy of the Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

- C. Only plaintiffs alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (check one):

60 days or more have passed.
 fewer than 60 days have passed.

- D. It is my best recollection that I filed a charge with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct on: 08-24-2010 (Date).

- E. Since filing my charge of discrimination with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct (check one):

One year or more has passed.
 Less than one year has passed.

IV. Relief

WHEREFORE, Plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs as well as (*check only those that apply*):

- Direct the defendant to hire the plaintiff.
 Direct the defendant to re-employ the plaintiff.
 Direct the defendant to promote the plaintiff.
 Direct the defendant to reasonably accommodate the plaintiff's disabilities.
 Direct the defendant to reasonably accommodate the plaintiff's religion.
 Direct the defendant to (*specify*): Movies About SEX HARASSMENT
 If available, grant the plaintiff appropriate injunctive relief, lost wages, PREVENTION
liquidated/double damages, front pay, compensatory damages, punitive damages,
prejudgment interest, post-judgment interest, and costs, including reasonable
attorney fees and expert witness fees.
 Other (*specify*): MAKE A HEALTHY WORK ENVIRONMENT
+ TO TEACH IT HOW SERIOUS SOMEONE WHO
TOUCHES ANOTHER

I declare under penalty of perjury that the foregoing is true and correct.

Signed this _____ day of _____, 20____.

Signature of Plaintiff
Address

*Employee Should be
Immediately BE
Addressed*

Harry Jeffries

Telephone number _____
Fax number (*if you have one*) _____

1-484-334-0680